

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re *Ex Parte* Application of Daniel Lavecky and Sunil Sharma for an Order Pursuant to 28 U.S.C. § 1782 Granting Leave to Obtain Documents for Use in Foreign Proceedings.

Case No. 17-mc-188

**EX PARTE APPLICATION OF DANIEL LAVECKY AND SUNIL SHARMA
FOR AN ORDER PURSUANT TO 28 U.S.C. § 1782 GRANTING LEAVE
TO OBTAIN DOCUMENTS FOR USE IN FOREIGN PROCEEDINGS**

Based on (a) the accompanying Memorandum of Law, (b) the Declaration of Hung G. Ta, dated June 6, 2017 (“Ta Declaration”) and all exhibits appended thereto, and (c) the Declaration of Jonathan Milner, dated June 6, 2017 and all exhibits appended thereto, Petitioners Daniel Lavecky and Sunil Sharma respectfully apply to this Court for an order pursuant to 28 U.S.C. § 1782, and Federal Rules of Civil Procedure 26 and 45, granting them leave to serve Atos SE with a subpoena in substantially the same form as Exhibit B to the Ta Declaration, for the production of documents for use in Australian court proceedings.

Petitioners have not made a previous application for the relief requested herein.

Dated: June 6, 2017
New York, New York

Respectfully submitted,

HUNG G. TA ESQ. PLLC

By:



Hung G. Ta, Esq.
JooYun Kim, Esq.
Natalia D. Williams, Esq.
250 Park Avenue, 7th Floor
New York, New York 10177
Tel: (646) 453-7288
Fax: (646) 453-7289
Email: hta@hgtlaw.com
jooyun@hgtlaw.com
natalia@hgtlaw.com
*Attorneys for Petitioners Daniel Lavecky
and Sunil Sharma*